

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

CARL FORSELL

Plaintiff,

vs.

SQUIRRELS, LLC, et al.

Defendants.

Case No: 22-cv-01454

Judge: Carmen Henderson

JOINT STATUS REPORT

The parties, by and through respective undersigned counsel and pursuant to the Court's Case Management Order entered on August 22, 2023, hereby respectfully submit the following Joint Status Report:

1. Status of Discovery: With the discovery deadline not until May 31, 2024, the parties have yet to commence fact discovery beyond the initial disclosures exchanged in accordance with Fed. R. Civ. P. 26(a)(1).
2. Outstanding Motions: There are no outstanding motions before the Court.
3. Case Schedule: At this time the parties believe that there is no reason to deviate from the case schedule as set forth in the Case Management Order.

4. Mediation: Plaintiff is ready and willing to work towards achieving amicable resolution to this dispute through the mediation process. Defendant Allmine does not want to mediate this dispute at this time.
5. Settlement: As of the date of this document's filing, there have not been any offers exchanged to resolve this matter. Plaintiff's demand remains what he is allegedly due and owing based upon the transactions underlying this action as prayed for in the Complaint. The balance totals \$774,373.60.

Respectfully submitted,

/s/- Thomas L. Sooy
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Submitted for review on 11/21/23

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Attorney for Defendant Squirrels, LLC

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2023, I electronically filed the Joint Status Report with the Clerk of the Court using the ECF system, which notified the following participants:

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